

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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|--------------------------|---|---------------------------|
| UNITED STATES OF AMERICA |) | |
| |) | |
| v. |) | CRIMINAL NO. 19-10345-DPW |
| |) | |
| DANA PULLMAN |) | |

**MOTION FOR EXTENSION OF TIME TO FILE DEFENDANT DANA PULLMAN'S
MEMORANDUM OF LAW IN SUPPORT OF HIS POST-VERDICT MOTION FOR
JUDGMENT OF ACQUITTAL AND MOTION FOR A NEW TRIAL**

Defendant, Dana Pullman, by and through undersigned counsel, respectfully moves this Court for an extension of time to file his Memorandum of Law in Support of his post-verdict Motion for Judgment of Acquittal and Motion for New Trial from December 20, 2022, to January 10, 2023.

As grounds, undersigned counsel (Attorney Kelley) has within the last 30 days been appointed or reassigned to 13 new cases¹. Additionally, on December 19, 2022, co-counsel Attorney Watkins is scheduled to begin another trial in Washington, DC in a January 6th case. Counsel for Mr. Pullman have begun substantial work on a draft memorandum, but due to the caseload obligations of each of Mr. Pullman's attorneys, do not reasonably believe they can complete the memorandum according to the current deadline and therefore request that this Court grant an extension of time until January 10, 2023, to file said Memorandum of Law.

Undersigned counsel has conferred with AUSA Kristina Barclay regarding this requested extension of time and she assents to this request. The parties agree that if this Court grants this

¹ Seven of these cases have been reassigned due to impending personnel changes within the Federal Defender Office, and 6 are new appointments. These cases include 3 child pornography cases with mandatory sentences of either 10 or 15 years; 3 bank robberies with potential career offenders; a fourth bank robbery which occurred on Martha's Vineyard involving three masked individuals with firearms; three controlled substance offenses with ten-year mandatory sentences; and a physician charged with Medicaid fraud.

request, the government will have until February 10, 2023, to file its opposition to Mr. Pullman's Memorandum of Law.

Respectfully Submitted,

DANA PULLMAN
By his attorneys,

/s/ Brendan Kelley
Brendan Kelley

/s/ Timothy Watkins
Timothy G. Watkins
Federal Defender Office
51 Sleeper Street, 5th Floor
Boston, MA 02210
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Brendan Kelley, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on December 12, 2022.

/s/ Brendan Kelley
Brendan Kelley